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January 7, 2025

**VIA ECF**

The Honorable Philip M. Halpern  
United States District Judge  
United States District Court for the Southern District of New York  
300 Quarropas St.  
White Plains, NY 10601

Re: Chun-Ko Chang. v. Shen Yun Performing Arts, Inc., et al., Case No. 24-cv-8980

Dear Judge Halpern:

We write on behalf of Defendant International Bank of Chicago (“IBC”) in the above-captioned matter to respectfully request an extension of time to respond to Plaintiff’s complaint. This is Defendant IBC’s second request for an adjournment or extension of such deadline, as the Court previously granted IBC’s motion to extend its deadline to answer or move to dismiss from December 31, 2024 to January 21, 2025 (ECF No. 12).

After the Court granted IBC’s initial motion for an extension of time, IBC’s co-defendants appeared in this action and moved for extensions of their time to respond to Plaintiff’s complaint until February 19, 2025. *See* ECF Nos. 21-25. The Court granted co-defendants’ motions on January 6, 2025 (ECF Nos. 26, 27). IBC believes it would serve the interests of efficiency and judicial economy to align its deadline to respond to the complaint with that of the other defendants. Thus, IBC respectfully requests that the Court extend its time to respond to Plaintiff’s complaint until February 19, 2025. Plaintiff takes no position with respect to the extension IBC is requesting herein.

Thank you for your consideration of this matter.

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